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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

841 Chestnut Building
Philadelphia, Pennsylvania 19107

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

In Reply Refer To: 3HW12

APR 12 1988

Keith McKennon, President
DOW Chemical U.S.A.
2030 Willard H. DOW Center
Midland Michigan 48674

Re: Revere Chemical Site
Nockamixon Township, Bucks County, PA
(see enclosed map)

Dear Mr. McKennon:

The U.S. Environmental Protection Agency ("EPA") is seeking information concerning a release, or the threat of a release, of hazardous substances into the environment at the above-referenced facility. Pursuant to the authority of Section 3007(a) of the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. § 6927(a), and Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 ("CERCLA"), 42 U.S.C. § 9604(e), your company is requested to furnish all information and documents in its possession, custody or control, or in the possession, custody or control of any of its officers, employees or agents which concern, refer, or relate to hazardous substances as defined by Section 101(14) of CERCLA, 42 U.S.C. § 9601(14). EPA is particularly interested in hazardous substances which were generated, transported to, stored, treated, or disposed of at the Revere Chemical site, located on Route 611, north of Route 412 in Nockamixon Township, Bucks County, Pennsylvania. The site was operated by companies including Echo, Inc., Revere Chemical Company, and DeRewal Chemical Co., Inc. from approximately 1965 until 1970. A transporter associated with the site was DeRewal Transportation Company.

All information and documents are due to the address listed below within fifteen (15) calendar days of receipt of this letter. Your search can be limited to those company locations in the Commonwealth of Pennsylvania and the State of New Jersey which are (have been) engaged in the manufacture of electronic and printed wiring board assemblies, printed circuit boards, deep drawn and wire drawn metal products, metal plating, precision metal forming and related activities.

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The response should include, but is not be limited to information and documentation concerning:

1. The types and quantities of the substances transported to, stored, treated, generated, or disposed of at the Revere Chemical site;
2. The dates that such substances were transported to, stored, treated, generated, or disposed of at the Revere Chemical site;
3. The state of the substances transported to, stored, treated, generated, or disposed of at the Revere Chemical site and the method by which the substances were contained or disposed of (i.e., liquid or solid in drums or uncontained, placed in lagoons, landfilled, placed in piles, etc.);
4. All correspondence between your company and any regulatory agencies regarding such substances;
5. All correspondence between your company and any third parties regarding such substances;
6. All documents relating to, any other person who generated, treated, stored, transported, or disposed, or who arranged for the treatment, storage, disposal, or transportation of such substances at the Revere Chemical site;
7. All deeds, rights-of-way, leases, or other real interests which you have or have had in the Revere Chemical site;
8. All documents that were maintained by your company of the transactions with the Revere Chemical site, and;
9. The current custodian, location description, and identity of any of the above referenced documents you were unable to obtain, and all efforts taken to obtain such documents.

In addition to the above information, if your company is privately insured against releases of hazardous wastes or substances as a result of the handling of such materials, please inform us of the existence of such insurance and provide us with copies of all insurance policies.

As used herein, the terms "documents" means writings (handwritten, typed or otherwise produced or reproduced) and includes, but is not limited to, any invoices, checks, receipts, bills of lading, weight receipts, toll receipts, correspondence, offers, contracts, agreements, deeds, leases, manifests, licenses, permits, bids, proposals, logs, books of original entry, minutes of meetings, memoranda, notes, calendar or diary entries, agendas, bulletins, notices, announcements, charts, maps, photographs, drawings, manuals, brochures, reports of scientific study or investigation,

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schedules, price lists, telegrams, teletypes, phonorecords, magnetic voice or video records, tapes, summaries, magnetic tapes, punch cards, recordings, discs, computer printouts, or other data compilations from which information can be obtained or translated.

You are entitled to assert a claim of business confidentiality covering any part of the submitted information, in the manner described in 40 C.F.R. Section 2.203(b). Information subject to a claim of business confidentiality will be made available to the public only in accordance with the procedures set forth in 40 C.F.R. Part 2, Subpart B. Unless a business confidentiality claim is asserted at the time the requested information is submitted, EPA may make this information available to the public without further notice to you.

Failure or refusal to comply with this request within the specified time period is a violation of Federal law which may result in further enforcement action, including, but not limited to, civil penalties of up to \$25,000 per day of violation, criminal fines of up to \$50,000 per day and/or imprisonment of up to two years, as stipulated in 42 U.S.C. Sections 6928(c), (d), and (g).

This information collected request is not subject to Office of Management and Budget review under the Paperwork Reduction Act, 44 U.S.C., Sections 3501-3520.

Please send the required information to:

Christopher B. Pilla
U.S. Environmental Protection Agency
Region III
PA CERCLA Remedial Enforcement Section (3HW12)
841 Chestnut Building 6th Floor
Philadelphia, PA 19107

If you have any question concerning this matter, please contact Christopher B. Pilla of my staff at (215) 597-8216.

Sincerely,



Bruce P. Smith, Chief
Hazardous Waste Enforcement Branch

Enclosures Location Map

cc: J. Snyder PADER
M. Barden, Esquire

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P 681 409 674

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

PS Form 3800, Feb. 1982

* U.S.G.P.O. 1983-403-517

Sent to Keith McKennon, Pres.	
DOW Chemical U.S.A.	
Street and No. 2030 Willard H.DOW Ctr	
P.O., State and Zip Code Midland Michigan 48674	
Postage	\$.
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	
Return receipt showing to whom Date, and Address if Delivered	AR200173
TOTAL Postage and Fees	\$
Postmark or Date	